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November 28, 2023

Via ECF

The Honorable Arun Subramanian, U.S.D.C.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: Go Global Retail, LLC v. Dream On Me, Inc.
Case No. 1:23-cv-07987-AS
GRSD File No. 31685-00003

Dear Judge Subramanian:

This firm, along with Fox & Melofchik, LLC, represents Defendant, Dream On Me Industries, Inc. i/p/a Dream On Me, Inc. ("DOM"). Currently scheduled before Your Honor is an in-person Initial Pretrial Conference on November 30, 2023, at 10:30 a.m., in Courtroom 15A. Pursuant to Local Civil Rule 7.1(d), and consistent with the Court's Individual Practices Rule 3(E), the parties respectfully request an adjournment for the reasons provided below.

By way of background, Plaintiff, Go Global Retail, LLC, ("Plaintiff") filed a complaint on September 14, 2023. *See* ECF #5. On November 21, 2023, DOM filed a Motion to Dismiss the Complaint. *See* ECF #16. DOM intends to file two motions for *pro hac vice* admission of Judah Skof, Esq., and Darren C. Barreiro, Esq., both of Greenbaum, Rowe, Smith & Davis, LLP, as soon as the supporting documents relative to each applicant is received. Furthermore, pursuant to Federal Rule of Civil Procedure 15(a)(1), and consistent with the Court's Individual Practices Rule 8(G)(ii), Plaintiff has elected to amend the complaint and intends to file it on December 22, 2023. In turn, Plaintiff has agreed that DOM's response will be due on January 31, 2023.

The Court's Notice of Initial Pretrial Conference requires attendance by the attorney who will serve as Lead Trial Counsel. *See* ECF # 6. One or both of applicants for *pro hac vice* admission would like to attend the Conference. Given that DOM has filed a Motion to Dismiss and Plaintiff's intent to file an amended complaint, coupled with the imminent motions for *pro hac vice* admission and the attendance requirements of the Court for the Initial Pretrial Conference, DOM respectfully requests an adjournment of the Conference to a date after all motions have been decided. Plaintiff consents to DOM's request for an adjournment, but only until after the motions for *pro hac vice* are heard and the motion to dismiss has been briefed. Plaintiff has not consented to an adjournment until after the motions have been decided.

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Accordingly, based on the information provided, the parties respectfully request that the Court adjourn the conference and use its discretion to select a date based on Your Honor's availability.

There are no other existing deadlines that this adjournment will affect. We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

GREENBAUM, ROWE, SMITH & DAVIS, LLP


Jessica M. Carroll

Gary E. Fox, Esq.

FOX & MELOFCHIK, LLC

Co-counsel for Defendant, Dream On Me Industries, Inc.
i/p/a Dream On Me, Inc.

cc: All Counsel of Record (via ECF)

So Ordered:

Arun Subramanian
United States District Court